

EXHIBIT 2

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
PETER BARBARA and JOHN DREW,		HOUSTON DIVISION	
<i>versus</i>		CIVIL ACTION No. 4:22-CV-003340	
MCGRIFF INSURANCE SERVICES, INC.,		PLAINTIFF'S WITNESS LIST	
LIST OF: PLAINTIFF TYPE OF HEARING: TRIAL		COUNSEL: JAY ALDIS (GRAY REED)	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	

No.	NAME OF WITNESS
1.	<p>John Drew</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his claims and allegations in this lawsuit.</p>
2.	<p>Peter Barbara</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, his work at McGriff, and explanations by McGriff of why he was excluded from the Program.</p>
3.	<p>Tommy Ebner</p> <p>(713) 449-1227</p> <p>Anticipated to testify regarding Drew and Barbara's exclusion from the Program (including being told by Bruce Dunbar why he determined they would not be in the Program), and the efforts of Ebner and/or others to have Drew included in the Program and/or receive a loan from the Program.</p>
4.	<p>Christina Bailey</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding McGriff's explanations for Drew and Barbara not being selected to participate in the Program, including in correspondence to the Equal Employment Opportunity Commission.</p>

5.	<p>Bruce Dunbar</p> <p>3025 Cherokee Road Birmingham, AL 35223 (205) 969-0913</p> <p>Anticipated to testify regarding McGriff's implementation of the Program, why Drew and Barbara were excluded from the Program, and his communications with McGriff personnel about the exclusion of Drew and Barbara.</p>
6.	<p>Doug Hodo</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, McGriff's criteria for selecting producers to receive discretionary forgivable loans under the Program, his knowledge of why Drew and/or Barbara were not selected for the Program, and his efforts to have Drew and/or Barbara included in the Program and/or receive a loan from the Program.</p>

Respectfully submitted,

GRAY REED

By: 

Jay Aldis
Texas State Bar No. 00785656
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7175
Fax: (713) 986-7100
jaldis@grayreed.com

**ATTORNEYS FOR PLAINTIFF
JOHN DREW**

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December 2023, a copy of the foregoing document was served on counsel of record by the Court's electronic filing system.


Jay Aldis

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
PETER BARBARA and JOHN DREW, <i>versus</i> MCGRIFF INSURANCE SERVICES, INC.,		HOUSTON DIVISION	
		CIVIL ACTION NO. 4:22-CV-003340	
		PLAINTIFF'S WITNESS LIST	
LIST OF: PLAINTIFF TYPE OF HEARING: TRIAL		COUNSEL: JAY ALDIS (GRAY REED)	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	
No.	NAME OF WITNESS		
1.	<p>John Drew</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his claims and allegations in this lawsuit.</p>		
2.	<p>Peter Barbara</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, his work at McGriff, and explanations by McGriff of why he was excluded from the Program.</p>		
3.	<p>Tommy Ebner</p> <p>(713) 449-1227</p> <p>Anticipated to testify regarding Drew and Barbara's exclusion from the Program (including being told by Bruce Dunbar why he determined they would not be in the Program), and the efforts of Ebner and/or others to have Drew included in the Program and/or receive a loan from the Program.</p>		
4.	<p>Christina Bailey</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding McGriff's explanations for Drew and Barbara not being selected to participate in the Program, including in correspondence to the Equal Employment Opportunity Commission.</p>		

5.	<p>Bruce Dunbar</p> <p>3025 Cherokee Road Birmingham, AL 35223 (205) 969-0913</p> <p>Anticipated to testify regarding McGriff's implementation of the Program, why Drew and Barbara were excluded from the Program, and his communications with McGriff personnel about the exclusion of Drew and Barbara.</p>
6.	<p>Doug Hodo</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, McGriff's criteria for selecting producers to receive discretionary forgivable loans under the Program, his knowledge of why Drew and/or Barbara were not selected for the Program, and his efforts to have Drew and/or Barbara included in the Program and/or receive a loan from the Program.</p>

Respectfully submitted,

GRAY REED

By: 

Jay Aldis

Texas State Bar No. 00785656

1300 Post Oak Blvd., Suite 2000

Houston, Texas 77056

Telephone: (713) 986-7175

Fax: (713) 986-7100

jaldis@grayreed.com

ATTORNEYS FOR PLAINTIFF

JOHN DREW

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December 2023, a copy of the foregoing document was served on counsel of record by the Court's electronic filing system.


Jay Aldis

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
PETER BARBARA and JOHN DREW,		HOUSTON DIVISION	
<i>versus</i>		CIVIL ACTION No. 4:22-CV-003340	
MCGRIFF INSURANCE SERVICES, INC.,		PLAINTIFF'S WITNESS LIST	
LIST OF: PLAINTIFF TYPE OF HEARING: TRIAL		COUNSEL: JAY ALDIS (GRAY REED)	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	
No.	NAME OF WITNESS		
1.	<p>John Drew</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his claims and allegations in this lawsuit.</p>		
2.	<p>Peter Barbara</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, his work at McGriff, and explanations by McGriff of why he was excluded from the Program.</p>		
3.	<p>Tommy Ebner</p> <p>(713) 449-1227</p> <p>Anticipated to testify regarding Drew and Barbara's exclusion from the Program (including being told by Bruce Dunbar why he determined they would not be in the Program), and the efforts of Ebner and/or others to have Drew included in the Program and/or receive a loan from the Program.</p>		
4.	<p>Christina Bailey</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding McGriff's explanations for Drew and Barbara not being selected to participate in the Program, including in correspondence to the Equal Employment Opportunity Commission.</p>		

5.	<p>Bruce Dunbar</p> <p>3025 Cherokee Road Birmingham, AL 35223 (205) 969-0913</p> <p>Anticipated to testify regarding McGriff's implementation of the Program, why Drew and Barbara were excluded from the Program, and his communications with McGriff personnel about the exclusion of Drew and Barbara.</p>
6.	<p>Doug Hodo</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, McGriff's criteria for selecting producers to receive discretionary forgivable loans under the Program, his knowledge of why Drew and/or Barbara were not selected for the Program, and his efforts to have Drew and/or Barbara included in the Program and/or receive a loan from the Program.</p>

Respectfully submitted,

GRAY REED

By: 

Jay Aldis
Texas State Bar No. 00785656
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7175
Fax: (713) 986-7100
jaldis@grayreed.com

**ATTORNEYS FOR PLAINTIFF
JOHN DREW**

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December 2023, a copy of the foregoing document was served on counsel of record by the Court's electronic filing system.


Jay Aldis

UNITED STATES DISTRICT COURT		SOUTHERN DISTRICT OF TEXAS	
PETER BARBARA and JOHN DREW, <i>versus</i> MCGRUFF INSURANCE SERVICES, INC.,		HOUSTON DIVISION	
		CIVIL ACTION NO. 4:22-CV-003340	
		PLAINTIFF'S WITNESS LIST	
LIST OF: PLAINTIFF TYPE OF HEARING: TRIAL		COUNSEL: JAY ALDIS (GRAY REED)	
JUDGE: ANDREW S. HANEN	CLERK: RHONDA HAWKINS	REPORTER:	
No.	NAME OF WITNESS		
1.	<p>John Drew</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his claims and allegations in this lawsuit.</p>		
2.	<p>Peter Barbara</p> <p>c/o Plaintiff's counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, his work at McGriff, and explanations by McGriff of why he was excluded from the Program.</p>		
3.	<p>Tommy Ebner</p> <p>(713) 449-1227</p> <p>Anticipated to testify regarding Drew and Barbara's exclusion from the Program (including being told by Bruce Dunbar why he determined they would not be in the Program), and the efforts of Ebner and/or others to have Drew included in the Program and/or receive a loan from the Program.</p>		
4.	<p>Christina Bailey</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding McGriff's explanations for Drew and Barbara not being selected to participate in the Program, including in correspondence to the Equal Employment Opportunity Commission.</p>		

5.	<p>Bruce Dunbar</p> <p>3025 Cherokee Road Birmingham, AL 35223 (205) 969-0913</p> <p>Anticipated to testify regarding McGriff's implementation of the Program, why Drew and Barbara were excluded from the Program, and his communications with McGriff personnel about the exclusion of Drew and Barbara.</p>
6.	<p>Doug Hodo</p> <p>Current McGriff employee; c/o Defense counsel</p> <p>Anticipated to testify regarding his knowledge of the Program, McGriff's criteria for selecting producers to receive discretionary forgivable loans under the Program, his knowledge of why Drew and/or Barbara were not selected for the Program, and his efforts to have Drew and/or Barbara included in the Program and/or receive a loan from the Program.</p>

Respectfully submitted,

GRAY REED

By: 

Jay Aldis
Texas State Bar No. 00785656
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7175
Fax: (713) 986-7100
jaldis@grayreed.com

**ATTORNEYS FOR PLAINTIFF
JOHN DREW**

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December 2023, a copy of the foregoing document was served on counsel of record by the Court's electronic filing system.


Jay Aldis